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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Promoting Investment in the 3550-3700 MHz Band (GN Docket No. 17-258)

Dear Ms. Dortch:

On February 8, 2018, Steve Martin, Jason Friedrich, and I met separately with Chairman Pai and his Wireless Advisor Rachael Bender; Commissioner O’Rielly and his Chief of Staff Brooke Ericson; Commissioner Clyburn, her Wireless Advisor Louis Peraertz, and her Law Clerk Joseph Kerins; Commissioner Carr and his Wireless Advisor Will Adams; and Commissioner Rosenworcel and her Wireless Advisor Umair Javed.

During these meetings, we provided an update on Ruckus’ acquisition by ARRIS, discussed Ruckus’ leadership and investments in CBRS, and reviewed the points made in Ruckus’ Comments and Reply Comments to the Notice of Proposed Rulemaking in the above-captioned proceeding. We made these points during our meetings:

- ARRIS and Ruckus Networks have demonstrated leadership across a number of market sectors, including Service Provider, Enterprise, and Residential.
- Ruckus has helped lead the standardization of CBRS via its activities in both the Wireless Innovation Forum and the CBRS Alliance.
- Ruckus has invested significant resources in the development of our CBRS product solutions and has conducted 25 CBRS trials across the United States with various customers and partners.
- The flexibility of the CBRS framework positions the United States to lead in the transition to 5G. It will enable a broad ecosystem – led by the mobile industry and including cable, enterprise, and industrial players – to deploy dense networks of small cells, especially for in-building coverage.

- Many of our customers have expressed the need for the interference protections afforded at the PAL tier for their enterprise and industrial use cases, and for localized deployments in both urban and rural areas. Mr. Martin described a transportation and logistics customer with transfer yards in both rural and urban areas, explaining that GAA access might be sufficient in a rural setting (i.e., sufficiently isolated from external sources of interference), but that the certainties of PAL operation would be required for these operationally critical services in urban areas.
- We noted that spectrum at the PAL tier would be put to the most intensive use via rules which enable traditional service providers such as mobile and cable operators, rural wireless broadband providers, and enterprise/industrial users - who often have localized uses in both urban and rural environments - to all have reasonable opportunity to obtain PAL rights.
- We explained that many of our customers have plans for CBRS that are contingent upon the expectation that they will have a reasonable opportunity to obtain PAL rights, further noting that most anticipate commencing operation at the GAA tier with interest in obtaining PAL rights when auctions are conducted.
- We thanked the Commission for their efforts to bring this rulemaking to an expeditious conclusion and noted the importance of the Commission restoring certainty about both the PAL and GAA tiers of operation.

This letter is being filed pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions, please contact the undersigned.

Sincerely,



David A. Wright

cc: Chairman Pai
 Commissioner O'Rielly
 Commissioner Clyburn
 Commissioner Carr
 Commissioner Rosenworcel
 Rachael Bender
 Brooke Ericson
 Louis Peraertz
 Will Adams
 Umair Javed
 Joseph Kerins